

David Whitley, et al.
Defendants

§ Civil Action No. 5:19-CV-00159-FB
§ [Consolidated Case]

1. I have lived in Texas for over eight years, and have been a resident of Brewster County, Texas since 2010. I currently live in Alpine, Texas. I am a United States citizen.
2. I am registered to vote in Brewster County, Texas.
3. I was born in Romania and now have dual citizenship in Romania and the United States.

4. In or around 2010, I immigrated to the United States with my husband on a six-month visa.
I shortly thereafter received my lawful permanent resident card.
5. I have always remained in the country legally, working, abiding by the law, and contributing to society.
6. In or around June of 2015, I obtained a Texas Driver License.
7. When I applied for my Driver License, as best as I can remember, I supplied my lawful permanent resident card and one or two other documents in order to prove that I was legally present in the United States.
8. In or around September of 2017, after nearly seven years of living and working in this country, I was naturalized as a U.S. citizen at a naturalization ceremony in El Paso, Texas.
9. After the naturalization ceremony, I also received a voter registration form from people handing them out that day. To the best of my recollection, I submitted the form within that next week and became a registered voter of Brewster County.
10. I voted for the first time in a local election in Brewster County in May of 2018. I was very excited to finally have the right to vote, and took a picture outside of the polling place to remember the occasion.
11. As best as I can remember, I have voted in almost every election that I have been eligible to vote in, including the November 2018 general election, as well as a local bond election and a special election. I plan to continue to exercise my right to vote in 2019 elections.
12. On January 28, 2019, I received a notice letter from the Brewster County Elections Administrator. The notice requested that I provide one of three documents demonstrating United States citizenship. The letter further stated that if I failed “to provide proof of

citizenship within 30 days from the date of this letter, your voter registration will be cancelled.” The letter was signed and dated by the Brewster County Voter Registrar.

13. When I showed the notice letter to my husband, who is a native-born United States citizen and who did not receive a similar notice, we began to believe that I may have been targeted because I am a naturalized citizen. When I learned more about the notice letters on the news, I became angry that I had been targeted like this and that the County may cancel my voter registration if I do not provide one of the specified forms of United States citizenship documentation within the required amount of time.
14. When I received the notice letter, I also realized that I could have easily missed receiving it on time at all, since I had just gotten back from an approximately two-month trip this winter. If the Notice had been sent during that time, I may have been removed from the voting rolls before I even knew that my status was in jeopardy.
15. There are upcoming 2019 elections. I am worried that if my registration is cancelled, that I would not be able to exercise my right to vote in these elections.
16. Complying with the notice letter will also require me to spend time, effort, and possibly money on submitting the requisite proof of United States citizenship.
17. Having lived in Romania while it was under a communist regime, I know how difficult it can be just to do things like obtain or submit documents to the government, or to comply with harsh government requirements. I see a similar situation happening here. I also treasure the importance of democracy and the ability to participate in the electoral process. The chance that my ability to vote could be arbitrarily curtailed undermines the rights I have as a United States citizen.

18. I believe that the Secretary of State has targeted me and many other people, just because we were once immigrants. I am also acutely aware that most naturalized citizens are minorities, which makes the situation particularly worrisome.
19. I am concerned that these notice letters are intimidating people who are naturalized citizens and discouraging them from participating in our democracy and exercising the right to vote, which is guaranteed by our Constitution.
20. I do not want to lose the right to vote, and I do not want to be and should not be on the Secretary of State's purge list.
21. This declaration is made pursuant to 28 U.S.C. § 1746. I declare under penalty of perjury that the foregoing is true and correct.



Alexandra Moldovan